

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :
- v. - :
RICKEY JOHNSON, :
a/k/a "Nigel Dawn Defarren," :
Defendant. :
- - - - - X

INDICTMENT

21 Cr.

21 CRIM 194

COUNT ONE

(Threatening Interstate Communications)

The Grand Jury charges:

1. From at least on or about January 30, 2021, through on or about February 4, 2021, in the Southern District of New York and elsewhere, RICKEY JOHNSON, a/k/a "Nigel Dawn Defarren," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, JOHNSON posted videos and messages on the internet in which he threatened to kill (i) four cable news contributors, (ii) a United States Senator, (iii) a member of the United States House of Representatives, (iv) a former Speaker of the United States House of Representatives, and (v) a state governor.

(Title 18, United States Code, Sections 875(c) and 2.)

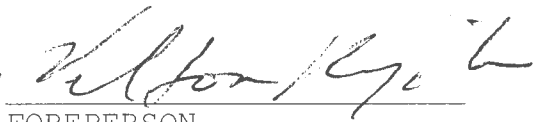
COUNT TWO

(Threatening a United States Official)

The Grand Jury further charges:

2. On or about February 3, 2021, in the Southern District of New York and elsewhere, RICKEY JOHNSON, a/k/a "Nigel Dawn Defarren," the defendant, threatened to assault and murder a United States official with intent to impede, intimidate, and interfere with such official while engaged in the performance of official duties, and with intent to retaliate against such official on account of the performance of official duties, to wit, JOHNSON posted videos on the internet in which he threatened to kill a United States Senator and a member of the United States House of Representatives.

(Title 18, United States Code, Sections 115(a)(1)(B) and (b)(4),
and 2.)


FOREPERSON


AUDREY STRAUSS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(Title 18, United States Code,
Sections 875(c), 115(a)(1)(B) and
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AUDREY STRAUSS

United States Attorney


Foreperson
